

Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

Plaintiff,

v.

HEIDI YOAST,

Defendant; *and*

HEIDI YOAST,

Counterclaim Plaintiff,

v.

JOB'S DAUGHTERS INTERNATIONAL,  
SHELLY COLE aka SHELLY HOWRIGON, an  
individual, ROD REID, an individual

Counterclaim Defendant

NO. 16-CV-01573-RSL

**MOTION FOR LEAVE TO  
AMEND ANSWER AND  
COUNTERCLAIMS**

Pursuant to Federal Rule of Civil Procedure 15(a), Heidi Yoast ("Defendant")  
respectfully moves for leave to amend her Answer to include counterclaims.

Granting Yoast's leave to amend is consistent with the language and policy of Rule  
15(a) favoring liberal amendment of pleadings.

MOTION FOR LEAVE TO AMEND - 1

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1 In support of this motion, Yoast relies on the accompanying proposed First Amended  
2 Answer and Counterclaims, and the proposed order granting leave to amend.  
3

4 DATED this 7th day of June, 2017.  
5

6 By /s/ Patricia I. Forman

7 Patricia I. Forman, Esq. California Bar No. 245108,  
8 *pro hac vice* for Counter- Complainant / Defendant  
Heidi Yoast

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14 By /s/ John B. Crosetto  
15 John B. Crosetto, WSBA #36667

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24 Attorneys for Defendant  
25 Heidi Yoast  
26

**CERTIFICATE OF SERVICE**

The undersigned declares and states as follows:

I am a citizen of the United States, over the age of 18 years, not a party to the above-referenced matter, and am competent to be a witness.

On June 7, 2017, I electronically filed the following document(s):

**MOTION FOR LEAVE TO AMEND ANSWER AND COUNTERCLAIMS**

with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all associated counsel of record.

I also served said documents in the manner set forth below on the following parties:

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*Attorneys for Plaintiff*

- ☒ *Via U.S. Mail*
- ☐ *Via Facsimile Transmission*
- ☒ *Via Email by USDC Western District EM/ECF Filing System*
- ☐ *Via Hand-Delivery*

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- ☒ *Via U.S. Mail*
- ☐ *Via Facsimile Transmission*
- ☒ *Via Email by USDC Western District EM/ECF Filing System*
- ☐ *Via Hand-Delivery*

*Attorneys for Plaintiff Job's Daughters International*

I declare under penalty of perjury according to the laws of the State of Washington that the above statements are true and correct.

SIGNED at Seattle, Washington this 7th day of June, 2017.

/s/ Jill M. Beagle

Printed name:  
Legal Assistant

GSB:8754252.1 [23226.69000]